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10 *Attorneys for Plaintiff, Wells Fargo Bank, N.A. Successor by Merger to Wells Fargo Bank
11 Minnesota, N.A., f/k/a Norwest Bank Minnesota, N.A. solely as Trustee for Structured Asset
12 Mortgage Investments II Inc. Bear Stearns Mortgage Funding Trust 2007-AR1, Mortgage Pass-
13 Through Certificates, Series 2007-AR1*

14 **UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA**

16 WELLS FARGO BANK, N.A. SUCCESSOR
17 BY MERGER TO WELLS FARGO BANK
18 MINNESOTA, N.A., F/K/A NORWEST
19 BANK MINNESOTA, N.A. SOLELY AS
20 TRUSTEE FOR STRUCTURED ASSET
21 MORTGAGE INVESTMENTS II INC. BEAR
22 STEARNS MORTGAGE FUNDING TRUST
23 2007-AR1, MORTGAGE PASS-THROUGH
24 CERTIFICATES, SERIES 2007-AR1,

25 Case No.: 2:20-cv-02155-RFB-BNW

26 **STIPULATION AND ORDER TO
27 EXTEND TIME PERIOD TO RESPOND
28 TO MOTION TO DISMISS [ECF Nos. 20
& 21]**

29 **[First Request]**

30 Plaintiff,

31 vs.

32 FIDELITY NATIONAL TITLE GROUP,
33 INC.; FIDELITY NATIONAL TITLE
34 INSURANCE COMPANY; GREAT
35 AMERICAN TITLE; DOE INDIVIDUALS I
36 through X; and ROE CORPORATIONS XI
37 through XX, inclusive,

38 Defendants.

39 Plaintiff, Wells Fargo Bank, N.A. Successor by Merger to Wells Fargo Bank Minnesota,
40 N.A., f/k/a Norwest Bank Minnesota, N.A. solely as Trustee for Structured Asset Mortgage
41 Investments II Inc. Bear Stearns Mortgage Funding Trust 2007-AR1, Mortgage Pass-Through
42 Certificates, Series 2007-AR1 (“Wells Fargo”), Defendant Fidelity National Title Insurance

1 Company (“FNTIC”) and Specially-Appearing Defendant, Fidelity National Title Group, Inc.
2 (“Fidelity” collectively “Defendants”), by and through their counsel of record, hereby stipulate
3 and agree as follows:

- 4 1. On November 23, 2020, Wells Fargo filed its Complaint in Eighth Judicial District
5 Court, Case No. A-20-825298-C [ECF No. 1-1];
- 6 2. On November 23, 2020, FNTIC filed its Petition for Removal to this Court [ECF
7 No. 1];
- 8 3. On January 25, 2021, FNTIC filed a Motion to Dismiss [ECF No. 20];
- 9 4. On January 25, 2021, Fidelity also filed a Motion to Dismiss [ECF No. 21];
- 10 5. Wells Fargo’s deadline to respond to Defendants’ Motions to Dismiss is currently
11 February 8, 2021;
- 12 6. Wells Fargo’s counsel is requesting an extension until March 9, 2021, to file its
13 response to the pending Motions to Dismiss;
- 14 7. This extension is requested to allow Wells Fargo additional time to finalize and file
15 its response to the pending Motions to Dismiss as lead handling counsel for Wells
16 Fargo continues to recover from an unexpected medical emergency.
- 17 8. Counsel for Defendants does not oppose the requested extension;

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1 9. This is the first request for an extension which is made in good faith and not for
2 purposes of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 8th day of February, 2021.

5 WRIGHT, FINLAY & ZAK, LLP

6 /s/ Lindsay D. Robbins

7 Lindsay D. Robbins, Esq.
8 Nevada Bar No. 13474
9 7785 W. Sahara Ave., Suite 200
10 Las Vegas, NV 89117
11 *Attorneys for Plaintiff, Wells Fargo Bank,
12 N.A. Successor by Merger to Wells Fargo
13 Bank Minnesota, N.A., f/k/a Norwest Bank
14 Minnesota, N.A. solely as Trustee for
15 Structured Asset Mortgage Investments II
16 Inc. Bear Stearns Mortgage Funding Trust
17 2007-AR1, Mortgage Pass-Through
18 Certificates, Series 2007-AR1*

19 **IT IS SO ORDERED.**

20 Dated this 8th day of February, 2021.

21 DATED this 8th day of February, 2021.

22 SINCLAIR BRAUN LLP

23 /s/ Kevin S. Sinclair

24 Kevin S. Sinclair, Esq.
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27 Encino, California 91436
28 *Attorney for Defendants, Fidelity National
Title Group, Inc. and Fidelity National Title
Insurance Company*

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RICHARD E. BOULWARE, II
31 United States District Court